

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

JUAN R. OVALLE

V.

**ALIEN MOLINA NUNEZ and
AJ AMERICAN TRANSPORT CORP.**

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CIVIL ACTION NO. 5:16-cv-00339

DEFENDANTS' NOTICE OF REMOVAL

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS:

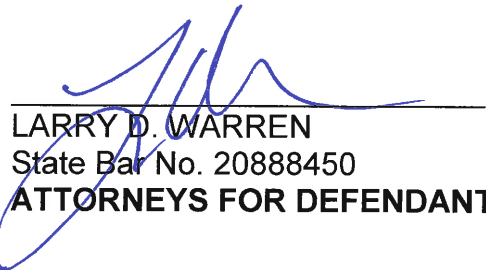
Pursuant to 28 U.S.C. §§ 1332 and 1441(a), Defendants, hereby removes this action to the United States District Court for the Southern District of Texas from the 341st Judicial District Court of Webb County, Texas, stating as follows:

1. Plaintiff, Juan R. Ovalle, commenced this action in the 341st Judicial District Court of Webb County, Texas, where it was given Cause No. 2016cvt002741D3. This action is between citizens of different states. Plaintiff is a resident of Texas. Defendant AJ American Transport Corp. is a Florida Corporation and Defendant Alien Molina Nunez is a resident of Florida. Further, Plaintiff claims damages for serious personal injury and is seeking damages of \$1,000,000. Accordingly, this Court has original jurisdiction under 28 U.S.C. § 1332.
2. Defendants, AJ American Transport Corp and Alien Molina Nunez received the summons and complaint on October 31, 2016, so this removal is timely under 28 U.S.C. § 1446(b).
3. A copy of all process, pleadings, and orders served upon Defendant is attached as Exhibit A.

4. Defendants have provided written notice of this Notice of Removal to all adverse parties and has filed a copy with the Clerk of the 341st Judicial District Court of Webb County, Texas.
5. Defendants consent to the removal.

Dated: November 22, 2016

Respectfully submitted,



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OF COUNSEL:

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CERTIFICATE OF SERVICE

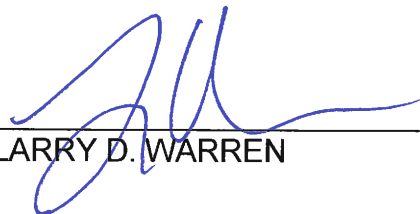
I hereby certify that on the 22 day of November 2016, the foregoing was filed with the Clerk of Court using the CM/ECF system, and was served on counsel **via Facsimile:**

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